

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jackie Miles : **Docket: 17 - 15520 – mdc**
: **Chapter 13**

Motion To Modify Post – Confirmation

Debtor, Jackie Miles, hereby moves this Court for an Order granting Debtor leave to modify its confirmed Chapter 13 plan. In support of its motion, Debtor avers as follows:

1. On 8/14/2017, Debtor commenced the above-captioned Chapter 13 bankruptcy.
2. On 11/14/2019, the above-captioned Chapter 13 was confirmed.
3. On 7/1/2020, Creditor, American Heritage Credit Union filed a Motion for Relief from the Automatic Stay as a result of Debtor's post – petition arrears.
4. Thereafter, on 9/2/2020 the Court approved a stipulation between the parties wherein Debtor would cure post-petition arrears as a part of an amended Chapter 13 plan.
5. Accordingly, Debtor seeks to modify its Chapter 13 plan to include post-petition mortgage arrears.

WHEREFORE, Debtor respectfully requests that this Court grant Debtor leave to modify its Chapter 13 plan post – confirmation.

Respectfully Submitted:

Date December 9, 2020

/s/ Demetrius J. Parrish, Jr.
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